

Nancy M. Erfle, OSB No. 902570
nerfle@grsm.com
GORDON REES SCULLY MANSUKHANI, LLP
1300 SW Fifth Avenue, Suite 2000
Portland, OR 97201
Telephone: (503) 382-3852
Facsimile: (503) 616-3600

Taylor T. Daly (admitted *pro hac vice*)
Taylor.daly@nelsonmullins.com
Brandee J. Kowalzyk (admitted *pro hac vice*)
Brandee.kowalzyk@nelsonmullins.com
Richard B. North, Jr. (admitted *pro hac vice*)
Richard.north@nelsonmullins.com
Shaniqua L. Singleton (admitted *pro hac vice*)
Shaniqua.singleton@nelsonmullins.com
Philip M. Busman (admitted *Pro Hac Vice*)
Phil.busman@nelsonmullins.com
James F. Rogers (admitted *pro hac vice*)
jim.rogers@nelsonmullins.com
Elizabeth C. Helm (admitted *pro hac vice*)
kate.helm@nelsonmullins.com
Mark R. Nash, admitted *Pro Hac Vice*
Mark.nash@nelsonmullins.com
NELSON MULLINS RILEY & SCARBOROUGH LLP
201 17th Street NW, Suite 1700
Atlanta, GA 30363
Telephone: (404) 322-6000
Facsimile: (404) 322-6050

Attorneys for Defendants

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

JUSTIN PETERSON,

Plaintiffs,

vs.

C.R. BARD, INC. and BARD PERIPHERAL
VASCULAR, INC.

Defendants.

Case No. 3:19-cv-01701-MO

**DEFENDANTS' RESPONSE TO
PLAINTIFF'S OBJECTIONS
DEFENDANTS' WITNESS LIST**

Defendants C. R. Bard, Inc. and Peripheral Vascular, Inc. (collectively “Bard”), through their respective attorneys, submit the following Response to Plaintiff’s Objections to Defendants’ Witness List:

Bard’s responses to Plaintiff’s Objections to Defendants’ Witness List (Doc. 119) are incorporated through Bard’s responses to Plaintiff’s objections as submitted during the deposition designation process, which responses will be filed on April 16, 2021, in accordance with the Court’s Order Granting the Parties’ Joint Submission to Modify Certain Pretrial Submission Deadlines (Docs. 77 and 78.).

To the extent Plaintiff’s objections are incorporated through Plaintiff’s Motion in Limine (see Docs. 119 and 120), Bard incorporates herein its forthcoming response to the same, to be filed April 16, 2021.

Dated: April 15, 2021.

GORDON REES SCULLY MANSUKHANI, LLP

By: s/ Nancy M. Erfle

Nancy M. Erfle, OSB No. 902570

nerfle@grsm.com

GORDON REES SCULLY MANSUKHANI, LLP

1300 SW Fifth Avenue, Suite 2000

Portland, OR 97201

Telephone: (503) 382-3852

Facsimile: (503) 616-3600

Taylor T. Daly (admitted *pro hac vice*)

Taylor.daly@nelsonmullins.com

Brandee J. Kowalzyk (admitted *pro hac vice*)

Brandee.kowalzyk@nelsonmullins.com

Richard B. North, Jr. (admitted *pro hac vice*)

Richard.north@nelsonmullins.com

Shaniqua L. Singleton (admitted *pro hac vice*)

Shaniqua.singleton@nelsonmullins.com

Philip M. Busman (admitted *Pro Hac Vice*)

Phil.busman@nelsonmullins.com

James F. Rogers (admitted *pro hac vice*)

jim.rogers@nelsonmullins.com

Elizabeth C. Helm (admitted *pro hac vice*)

kate.helm@nelsonmullins.com

Mark R. Nash, admitted *Pro Hac Vice*
Mark.nash@nelsonmullins.com
NELSON MULLINS RILEY & SCARBOROUGH LLP
201 17th Street NW, Suite 1700
Atlanta, GA 30363

*Attorneys for Defendants C.R. Bard, Inc. and Bard
Peripheral Vascular, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of this document to be filed on the 15th day of April, 2021, via the CM/ECF filing system which will transmit a service copy of the same to all counsel of record.

Dated: April 15, 2021.

GORDON REES SCULLY MANSUKHANI, LLP

By: s/ Nancy M. Erfle

Nancy M. Erfle, OSB No. 902570

nerfle@grsm.com